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October 11, 2023

HON. LORNA G. SCHOFIELD

Thurgood Marshall

United States District Court

Southern District of New York

40 Foley Square

New York, NY 10007

Honorable Judge Schofield,

Re: Timothy Rodgers v. Mercy College, et. al.

Docket No.: 23CV07278

As the record reflects, we are the attorneys for the Plaintiff in the above-referenced matter. We respectfully submit this correspondence in accordance with Judge Schofield's Order dated October 5, 2023.

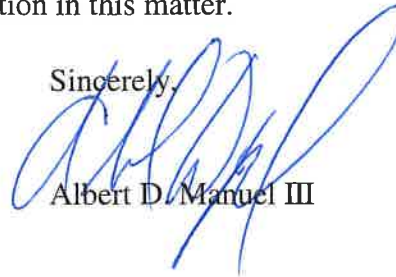
Plaintiff attempted to locate the Defendants Latimer and Southard in order to properly serve the Complaint upon each of them. Plaintiff's efforts included researching several social media sites and forums as well as interviewing individuals who may have knowledge of Defendants Latimer and Southard's employment. Through our investigative efforts Plaintiff ascertained that William W. Latimer is currently serving as President of Chestnut Hill College in Philadelphia, PA. This information was confirmed by a staffer at that College via telephone communication.

In our search for Defendant Southard, Plaintiff learned that Defendant Southard may be employed at Lincoln Tech in Paramus New Jersey as Campus Director. However, in attempting to verify this information with the school, we learned that Defendant Southard is no longer employed at Lincoln Tech.

On October 11, 2023, in response to Plaintiff's request, counsel for Mercy College supplied Plaintiff with the last known addresses of Defendants William W. Latimer and Kristine Southard. Having only obtained this information October 11, 2023 and in an effort to have the outstanding Defendants served prior to October 18, 2023, Plaintiff is now preparing to serve the aforementioned Defendants at the addresses provided by Mercy College Counsel.

We thank the Court for its time and attention in this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'ADM', is written over the word 'Sincerely,'.

Albert D. Manuel III

ADM:dm